

1 ISMAIL J. RAMSEY (CABN 189820)
United States Attorney

2 MARTHA BOERSCH (CABN 126569)
3 Chief, Criminal Division

4 CHRISTIAAN HIGHSMITH (CABN 296282)
DAVID WARD (CABN 239504)
5 Assistant United States Attorneys

6 MATTHEW CHOU (CABN 325199)
Special Assistant United States Attorney

7 450 Golden Gate Avenue, Box 36055
8 San Francisco, California 94102-3495
9 Telephone: (415) 436-7200
FAX: (415) 436-7230
christiaan.highsmith@usdoj.gov
david.ward@usdoj.gov
matthew.chou2@usdoj.gov

11 Attorneys for United States of America

12 UNITED STATES DISTRICT COURT

13 NORTHERN DISTRICT OF CALIFORNIA

14 SAN FRANCISCO DIVISION

16 UNITED STATES OF AMERICA,) CASE NO. 20-CR-00249 RS
17 Plaintiff,)
18 v.) **DECLARATION OF DAVID WARD IN
ROWLAND MARCUS ANDRADE,) SUPPORT OF UNITED STATES'
20 Defendant.) **MEMORANDUM IN SUPPORT OF CIPA
SCHEDULING ORDER****

22 I, David Ward, declare and state as follows:

23 I am an Assistant United States Attorney for the Northern District of California, and I am
24 assigned to the above-captioned case.

25 1. On July 31, 2024, the government provided to defense counsel Michael Shepard, Kerrie
26 Dent, and Cindy Diamond via email a copy of the government's proposed CIPA Briefing
27 Schedule.

- 1 2. On August 9, 2024, government counsel met and conferred with defense counsel Dent and
- 2 Diamond via videoconference regarding a proposed CIPA briefing schedule in this case.
- 3 3. On August 12, 2024, I met and conferred by telephone with defense counsel Dent regarding a
- 4 proposed briefing schedule in this case.
- 5 4. On August 13, 2024, I notified defense counsel by email that the government would agree to
- 6 move up its initial CIPA Section 4 filing deadline to October 1, 2024, and would also agree
- 7 to move up subsequent CIPA filing dates accordingly.
- 8 5. I spoke by phone with defense counsel Dent on August 27, 2024 regarding a proposed
- 9 briefing schedule in this case.
- 10 6. On August 28, 2024, government counsel received an email from Ms. Dent which stated in
- 11 relevant part: "*CIPA: we would like to move forward with 4-pagers rather than agree to a*
- 12 *schedule.*" The email provided no further explanation or detail.

13 Executed this 29th day of August, 2024, in San Francisco, California.

14
15 */s/ David Ward* _____
16 DAVID WARD
17 Assistant United States Attorney
18
19
20
21
22
23
24
25
26
27
28